

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Christopher Wheeler,)
)
 Plaintiff,) Case No. 22-cv-3020
)
 v.) Honorable Lindsay C. Jenkins
)
Officer Jordan Lyles,)
)
 Defendants.)

OPPOSED MOTION FOR ENTRY OF HIPAA QUALIFIED PROTECTIVE ORDER

NOW COMES Defendant, OFFICER JORDAN LYLES, by and through his attorneys Troy S. Radunsky and Zachary G. Stillman, of DeVore Radunsky LLC, and for his Opposed Motion for Entry of HIPAA Qualified Protective Order, states as follows:

1. Defendant's Counsel conferred with Plaintiff on October 4, 2023, regarding this Motion, and Plaintiff advised that he opposes it.
2. Plaintiff also advised during that meeting that he would like to obtain written discovery from Defendant.
3. Defendant now wishes to issue additional medical record subpoenas. Those records will be provided to Plaintiff upon Defendant's receipt of the same.
4. This discovery is expected to include protected health information ("PHI") as defined by 45 C.F.R. §§ 160.103.
5. HIPAA and its implementing regulations prohibit "covered entities," including medical care providers, from disclosing PHI in judicial proceedings other than by authorization or qualified protective order. 45 C.F.R. § 164.512(e).

6. In order to protect Plaintiff's confidential and personal records, pursuant to 45 C.F.R. § 160.103 and 164, Defendant respectfully requests that this Court enter a Qualified Protective Order so that Plaintiff's medical records and related medical information may be obtained.

Wherefore, Defendant, OFFICER JORDAN LYLES, respectfully requests that this Court enter the Qualified Protective Order on behalf of the Defendant.

Respectfully Submitted:

/s/ Troy S. Radunsky
Attorney for Defendant
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CERTIFICATE OF SERVICE

The undersigned, a law clerk, hereby certifies that he electronically filed the foregoing document on October 10, 2023, with the Northern District of Illinois ECF System, serving a copy to all parties.

/s/ Andrew Hoseuk Kim
Andrew Hoseuk Kim

PLAINTIFF

Christopher Wheeler, Pro Se Plaintiff
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